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Attorneys for Plaintiff EPA USA Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

EPA USA Incorporated,

Plaintiff,

v.

Kamil Knap,

Defendant.

No. 2:24-cv-00749-GMS

**Plaintiff's Unopposed
Motion to Seal
Doc. 26-2**

1 Pursuant to Civil Local Rule 5.6 Plaintiff EPA USA Incorporated moves to
2 seal the "Convertible Debt Agreement" (Doc. 26-2) filed by Defendant. There

1 are compelling reasons to seal the Convertible Debt Agreement (“CDA”), which
2 contains EPA USA Incorporated’s proprietary information that is not available to
3 the general public including bank accounts and SWIFT codes for three different
4 companies. (Doc. 26-2 §2-5).

5 The CDA contains a Confidentiality provision prohibiting disclosure of the
6 information contained within the CDA without prior consent by the other party.
7 (Doc. 26-2 §12-2). Accordingly, EPA USA Incorporated respectfully requests
8 that the Court grant its Motion to Seal.

9 Counsel for Defendant confirmed via email on May 22, 2024 that he does
10 not oppose this Motion. A proposed order is submitted herewith.

Dated: May 22, 2024

GRIFFITH BARBEE PLLC

By: /s/ Ashley Menage

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